

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2019-137-C**

Application of	)	
	)	
<b>Advanced Technology Group, LLC</b>	)	
	)	
for a Certificate of Public Convenience	)	<b>DIRECT TESTIMONY OF NATHAN</b>
and Necessity to Provide Resold and	)	<b>WRIGHT</b>
Facilities-Based Local Exchange and	)	
Interexchange (Including Exchange	)	
Access) Telecommunications Services in	)	
the State of South Carolina and for	)	
Alternative and Flexible Regulation	)	

I. Introduction

**1 Q. PLEASE STATE YOUR NAME AND BUSINESS**  
**2 ADDRESS.**

**3 A.** My name is Nathan Wright. My business address is 5100 B Pierce Ct, Evans GA, 30809.

**4 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

**5 A.** I am the Network Operations Manager of Advanced Technology Group, LLC. (“ATG” or  
**6 “Applicant”).**

**7 Q. PLEASE GIVE A BRIEF DESCRIPTION OF YOUR BACKGROUND AND EXPERIENCE**  
**8 IN BUSINESS AND TELECOMMUNICATIONS.**

**9 A.** I have been with ATG since 2012, managing voice and data installations for medium to large  
**10 businesses. Before joining ATG, from 2006 until 2012 I worked in a variety of capacities at**  
**11 Knology, Inc. From 1998 until 2003, I was an Owner of Wright Data Services, where I consulted**  
**12 on networking, software, hardware installation, and telephony services and sales. I earned a**  
**13 Bachelor’s of Science Degree in Management Information Systems from Auburn University in**

1 1997.

2 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

3 A. My testimony describes the nature of ATG's proposed service offerings within the State of South  
4 Carolina, and demonstrates its financial, managerial and technical ability to provide the  
5 telecommunications services for which ATG seeks authority.

6 **Q. DO YOU WISH TO INCORPORATE BY REFERENCE ANY DOCUMENTS INTO YOUR**  
7 **TESTIMONY?**

8 A. Yes. I wish to incorporate by reference the underlying Application filed in this proceeding and its  
9 associated attachments.

10 II. The Business of ATG

11 **Q. HAS ATG REGISTERED TO DO BUSINESS IN SOUTH CAROLINA?**

12 A. Yes. ATG is a Limited Liability Company organized under the laws of the State of South Carolina.  
13 ATG attached a copy of ATG's Articles of Organization and Certificate of Existence from the  
14 State of South Carolina to the Company's Application as Exhibit A.

15 **Q. PLEASE DESCRIBE THE SERVICES ATG INTENDS TO PROVIDE WITHIN THE**  
16 **STATE OF SOUTH CAROLINA.**

17 A. ATG seeks to offer business subscribers with private branch exchange (PBX) phone systems with  
18 voice over internet protocol (VoIP) technology using multiple interfaces that include Fiber,  
19 Microwave, Ethernet, Multiprotocol Label Switching (MPLS), and others. ATG will also offer  
20 private line and Internet connections. Applicant's traditional voice services such as local exchange  
21 service, access to 911, e-911, directory assistance, long distance and operator services will be

1 available only by way of VoIP delivery. ATG does not propose to offer any residential services.

2 The handoff at the customer's premises can be Session Initiation Protocol (SIP) or analog, enabling  
3 the customer to retain their existing investments and a cost-effective migration from Time Division  
4 Multiplexing (TDM) to SIP for a hosted PBX solution. We will also provide various types of  
5 Fiber Circuits to business customers.

6 **Q. WHAT CARRIER WILL ATG UTILIZE AS ITS UNDERLYING CARRIER FOR**  
7 **SERVICES IN SOUTH CAROLINA?**

8 A. ATG intends to utilize Bandwidth.com and other providers along with its own facilities. ATG  
9 will not require a direct interconnection Agreement with incumbent local exchange carriers  
10 (ILECs) but will resell those ILEC services from time to time.

11 **Q. DOES ATG HAVE AUTHORIZATION TO PROVIDE INTRASTATE**  
12 **TELECOMMUNICATIONS SERVICE IN ANY OTHER STATE?**

13 A. ATG has applied with the Georgia Public Service Commission for a Certificate of Public  
14 Convenience & Necessity to provide resold and facilities based local exchange services and  
15 interexchange services in the State of Georgia. ATG intends to seek authority in additional  
16 jurisdictions on a case-by-case basis.

17 **Q. HAS ATG EVER HAD AN APPLICATION FOR A CERTIFICATE OF PUBLIC**  
18 **CONVENIENCE AND NECESSITY DENIED?**

19 A. No.

20 **Q. PLEASE DESCRIBE ATG'S PROPOSED TARIFF.**

1 A. ATG attached its proposed tariff to our application as Exhibit C. We believe that ATG's tariff  
2 complies with all applicable Rules and Orders of the Commission.

3 **Q. WILL ATG COMPLY WITH THE COMMISSION'S ORDERS REGARDING THE**  
4 **PROVISION OF LOCAL EXCHANGE SERVICE?**

5 A. Yes, ATG will provide and market local exchange and interexchange services under Commission  
6 rules and orders. In addition, ATG will provide interstate services in compliance with all FCC rules  
7 and regulations.

8 **Q. HOW WILL ATG MARKET SERVICES IN SOUTH CAROLINA?**

9 A. ATG intends to market its services via direct sales by direct staff employees employed  
10 permanently by the Company.

11 III. Managerial, Technical, and Financial Qualifications

12 **Q. DOES ATG HAVE SUFFICIENT MANAGERIAL, TECHNICAL AND FINANCIAL**  
13 **RESOURCES AND ABILITY TO PROVIDE THE TELECOMMUNICATIONS**  
14 **SERVICES PROPOSED IN ITS APPLICATION?**

15 A. Yes, ATG has sufficient managerial, technical, and financial resources and ability to provide the  
16 telecommunications services for which ATG seeks authority. ATG's personnel represent a broad  
17 spectrum of business and technical disciplines, possessing over 125 combined years of individual  
18 and aggregate telecommunications experience.

19 Exhibit D of our application discusses the qualifications and experience of ATG's key  
20 management personnel.

1 **Q. HOW DOES ADVANCED TECHNOLOGY GROUP, LLC HANDLE CUSTOMER**  
2 **SERVICE REQUESTS?**

3 A. ATG's customer service representatives are available to assist customers, and will promptly  
4 respond to all customer inquiries. Customers may call our support line at (706) 823-1449 24/7  
5 and/or email us at [support@catg.com](mailto:support@catg.com).

6 **Q. PLEASE DESCRIBE THE FINANCIAL CONDITION OF ADVANCED TECHNOLOGY**  
7 **GROUP, LLC.**

8 A. To support ATG's financial ability to provide the services sought, ATG filed certain financial  
9 statements as Exhibit E to the application. ATG is well positioned financially to offer and provide  
10 services in South Carolina.

11 IV. Regulatory Treatment and Other Matters

12 **Q. DOES ATG HAVE OFFICES IN SOUTH CAROLINA?**

13 A. No. ATG does not have offices in South Carolina. ATG requests, under Rule 103-610, that the  
14 Commission allow it to keep all books and records at its offices in Evans, Georgia. If the  
15 Commission Staff or ORS should desire to inspect such books and records, ATG will provide  
16 access expeditiously at its own expense.

1 **Q. HOW WILL ATG KEEP ITS FINANCIAL RECORDS?**

2 A. ATG uses Generally Accepted Accounting Principles (“GAAP”). If the Commission’s Rules  
3 require the use of the Uniform System of Accounts (“USOA”), ATG requests a waiver so it can be  
4 allowed to use GAAP.

5 **Q. WHAT REGULATORY TREATMENT IS ATG SEEKING FOR ITS LOCAL EXCHANGE**  
6 **SERVICES?**

7 A. ATG requests that the Commission allow it to employ a flexible local exchange rate structure first  
8 authorized by Order No. 98-165 in Docket No. 97-467-C. Specifically, ATG requests that the  
9 Commission: a) adopt for its local exchange services a competitive rate structure incorporating  
10 maximum rate levels with the flexibility for rate adjustment below the maximum rate levels; and b)  
11 presume that ATG's tariff filings for local exchange services be valid upon filing, subject to the  
12 Commission’s authority, within thirty (30) days, to institute an investigation of such filings. At the  
13 discretion of the Commission, such filings may be suspended pending further order of the  
14 Commission and any such filings may be subject to the same monitoring process as the  
15 Commission applies to other, similarly situated carriers.

16 **Q. WHAT REGULATORY TREATMENT IS ATG SEEKING FOR ITS INTEREXCHANGE**  
17 **SERVICES?**

18 A. ATG requests that its business service offerings be regulated under the procedures described and  
19 set forth in Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C, as modified by Order No.  
20 2001-997 in Docket No. 2000-407-C. Specifically, ATG requests that the Commission regulate its  
21 business services as the Commission regulates those of AT&T Communications of the Southern  
22 States, Inc. (“AT&T”). Further, ATG requests that the Commission: a) remove the maximum rate

1 tariff requirements for ATG's business services and future private line, and customer network-type  
2 offerings; b) presume that ATG's tariff filings for these services be valid upon filing. However, if  
3 the Commission institutes an investigation of a particular filing within seven (7) days, the tariff  
4 filing will be suspended until further order of the Commission; and c) grant ATG the same  
5 treatment as AT&T with any future relaxation of the Commission's reporting requirements.

6 IV. Public Interest

7 **Q. HOW WILL RESIDENTS OF SOUTH CAROLINA BENEFIT FROM ATG's SERVICES**  
8 **AND PRESENCE IN SOUTH CAROLINA?**

9 A. The Commission's grant of this certificate is in the public interest because the business customers  
10 (and the end users of such business customers) of ATG will receive increased choice, improved  
11 quality of service, and heightened opportunities to obtain improved technology in business. Market  
12 incentives for new and old telecommunications providers in South Carolina will improve greatly  
13 through an increase in the diversity of suppliers and competition in the local exchange  
14 telecommunications market. Consistent with the Commission's intent to aid in developing a  
15 competitive telecommunications environment in South Carolina, granting a certificate of authority  
16 to ATG to provide local exchange and interexchange service will offer increased efficiency to the  
17 State's telecommunications infrastructure through greater reliability of services and in increase in  
18 competitive choices.

1 Q. HAS THE COMPANY EVER BEEN THE SUBJECT OF AN INVESTIGATION BY ANY  
2 STATE REGULATORY BODY OR BY THE FCC?

3 A. No. The company prides itself that it has never had any issues with the FCC, nor has it at any time  
4 been in any violation or Red Light status with the FCC. The Company has always complied timely  
5 with all FCC reporting requirements and shall continue to do so.

6 Q. WILL THE COMPANY AGREE TO ABIDE BY AND COMPLY WITH THE  
7 COMMISSION'S RULES AND REGULATIONS AND COMMISSION ORDERS IN ITS  
8 OPERATIONS IN SOUTH CAROLINA?

9 A. Yes.

10 Q. WILL THE COMPANY FILE ALL APPLICABLE REPORTS AS REQUIRED BY THE  
11 COMMISSION?

12 A. Yes. ATG knows the Commission's requirements that all telecommunications carriers file a report  
13 on South Carolina operations, a gross receipts report, and a universal service contribution report  
14 annually and shall meet all such reporting and remittance obligations.

15 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

16 A. Yes. I would like to thank the Commission for this opportunity to provide information relevant to  
17 ATG's application and am ready to provide any additional information that the Commission may  
18 need in deciding.